

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JULIE BOUMEHDI,)	
)	
	Plaintiff,)	
)	
v.)	Case No. 04 C 0672
)	
PLASTAG HOLDINGS LLC,)	The Honorable Charles R. Norgle
)	
Defendants.)	Magistrate Judge Michael T. Mason

**AGREED MOTION TO DISMISS WITH PREJUDICE AND WITHDRAW
MOTION TO CONVERT**

NOW COMES the Plaintiff, Julie Boumehdi, through Counsel, Carol Billie Oshana and Basile Law Firm, and the Defendant, Plastag Holdings, L.L.C., through Counsel, John Lee and Freeborn & Peters, and move this Court to enter an Order dismissing the foregoing action with leave to reinstate and withdrawing the previously-filed Motion to Convert. In support hereof, the parties state as follows:

1. The parties have agreed to dismiss the aforementioned matter with leave to reinstate by January 15, 2008.
2. Should the Plaintiff fail to reinstate her case by January 15, 2008, then the parties have agreed that this matter shall be dismissed with prejudice.
3. Furthermore, the parties have agreed that the Plaintiff shall withdraw her Motion to Convert Settlement to Judgment, which she filed on December 3 and 4, 2007.
4. Finally, the parties ask the Court to seal this Motion as well as the previously-filed Motion to Convert Settlement to Judgment.

WHEREFORE, the Plaintiff, Julie Boumehdi, moves this Court to enter an Order dismissing the matter with leave to reinstate by January 15, 2008. The parties also ask the court to permit Plaintiff to withdraw her Motion to Convert Settlement to Judgment, and to seal this Motion and the previously-filed Motion to Convert Settlement to Judgment. Finally, after January 15, 2008, the parties wish the matter to be dismissed with prejudice.

JULIE BOUMEHDI,

By: /s/ Carol Oshana
One of her Attorneys

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